



Rhode Island Insurance Federation



June 12, 2025

The Honorable Robert E. Craven
Chair, House Judiciary Committee
Rhode Island State House
Providence, RI 02903

RE: H.6370- An Act relating to courts and civil procedure – procedure generally – causes of action

Dear Chair Craven:

The Rhode Island Insurance Federation and American Property Casualty Insurance Association (“The Trades”) submit this statement in opposition to House Bill 6370 as drafted, which would create an umpire appraisal process for fire policies in Rhode Island.

We recognize the potential benefits of an umpire appraisal process for insurers and claimants. If drawn fairly, it can incentivize positive outcomes for both sides, saving time and money and keeping cases out of the courts. Notably, provisions like lines 137-138, limiting the umpire process to amounts in dispute are helpful.

However, we have several concerns with the current draft’s overly punitive provisions for insurers including, requiring insurers to “resolve the dispute” even if coverage is denied, requiring interest payment from the date of loss, and adding additional violations for notification, labor depreciation calculations and more. These provisions apply pressure on only one side of the dispute, disincentivizing fair use of the process.

As we have seen with umpire appraisals in the auto insurance context, procedures that create an imbalanced process are ripe for abuse, requiring repeated legislative amendments. In the auto context, the umpire appraisal process was enacted in 2023 (S.925), already requires amendment (H.6054 in 2025), and is likely to be back in the near future. A balanced process will create procedures that both sides want to use and, as a result, have the greatest likelihood of generating fair outcomes.

We would welcome the opportunity to work with the sponsor and bill proponents to help create the best the best possible umpire appeal process that empowers consumers and incentivizes successful negotiations. For the aforementioned reasons, the Trades oppose H.6370 as drafted and look forward to continuing discussion on the bill.

Respectfully submitted,

Rhode Island Insurance Federation

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